

US EPA ARCHIVE DOCUMENT

Sep. 9/28/71

REney:ow  
9/28/71

Evaluation of Naled for Registration No. 1769-LR  
Submitted by National Chemsearch Corp.  
Ltr. June 14, 1971

I. Introduction

1. Naled is Dibrom.

2. Use to sewage plants. 1 gal. in about 1 minute before sewage stream goes into spraying or distributor arm into filter beds. Repeat when necessary. This addition is based on flow of 500 gallons/min. Control may be maintained by treating once every 6 days.

3. The ltr. of June 14, 1971, is in reply to PRD's letter of April 7, 1971.

a. About 800 ppm are added to trickling filters. Retreatment on label is a 6 day intervals if needed but may not be needed every 2-3 wks.

b. Normally needed applications during April to October. About 9 treatments would be considered maximum. Total pounds would depend on sewage flow and fly infestation and overloaded plants.

A 20 million gal/day flow with 16 trickling filters would require 5.8 lbs/A/trickling filter. If treated nine times about 52.2 lbs per trickling filter/yr. Note: If plant contains 16 filters, this would be 835.2 lbs A/yr from this plant. (About 115.200 ppm/yr).

c. Analytical procedure. Potentiometric for Dibrom and DDVP. Method does not appear to determine other degradation products. This is not the best type method.

Note:

Sewage plant 1 filter system

*25/800,000*  
A 20 million gal/day plant: *16 filters*  
868 gal. or 7229 lbs/min.

Use 16.6 lbs of 35% = 800 ppm/filter in 7229 lbs.

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A plant is treated about 9 times/season  
 $9 \times 800 \text{ ppm} = 7,220 \text{ ppm/filter}$ .

A sewage plant with 16 filter systems uses  
 $800 \text{ ppm} \times 9 \text{ treatments} \times 16 \text{ filters} = 115,200 \text{ ppm per season}$   
or  $.16.6 \text{ lbs} \times 35\% \times 9 \times 16 = 836.64 \text{ lbs A/season}$ .

This 836.64 lbs A/season is one heck of a lot of ? compounds going into water.

## II. Recommendation

1. The analytical method used for determining DDVP and Dibrom is not satisfactory.

2. Samples of treated effluent taken 10 minutes after treatment of the trickle filter would not be expected to contain residues. On page 3 of your reply you state "All samples taken at the secondary clarifier were taken at the end where the sewage water flowed from the trickling filter."

Periodic samples over a pre-determined time period must be taken at the point where water enters the river.

A An important aspect of this problem is how much Dibrom (or DDVP) gets into a river per unit time. This must then be related to total river flow during drought periods.